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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Case No.: 1-23-42457-ess
Chapter 11

Rosemarie Lopa,

Debtor.

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**SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF APPLICATION TO AUTHORIZE
EMPLOYMENT OF LAW OFFICE OF ALLA KACHAN, P.C.,
AS COUNSEL TO THE DEBTOR**

I, Alla Kachan, Esq., member of Law Office of Alla Kachan, P.C., submit this supplemental affidavit in support of the application of Rosemarie Lopa, the Debtor-in-Possession (“the Debtor”) in the above-captioned chapter 11 case for an Order authorizing the employment of Law Office of Alla Kachan, P.C. as counsel to the Debtor under the terms set forth in the Application, and hereby aver as follows.

1. Debtor commenced this bankruptcy case with the filing of a voluntary petition under Chapter 11 on July 12, 2023, See ECF Doc. No. 1.
2. The Law Office of Alla Kachan, P.C had been retained by the Debtor on July 12, 2023, to represent the Debtor in the above referenced Chapter 11 bankruptcy case.
3. On March 29, 2024, the application to employ Law Offices of Alla Kachan PC as attorney for the Debtor has been filed on the Docket, ECF No. 50.

4. Unfortunately, the delay in filing of application to retain the Law Offices of Alla Kachan PC was due to the high volume of cases and change in staff members. Further, the Debtor was needed and additional time putting together affidavits relating to payment of third-party retainer (“Lar Dan Affidavits”).
5. The acceptance of a third-party retainer will not in any way impact the Law Offices of Alla Kachan PC’s independent professional judgement and ability to maintain client confidentiality.

Dated: Brooklyn, New York
July 10, 2024

/s/ Alla Kachan
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